

As an XM subscriber (and occasional XM and local broadcast listener), I respectfully request that the FCC would reject the National Association of Broadcaster's petition 04-160. XM radio is providing an excellent (paid) service, and by adding the additional Instant Traffic and Weather channels, it adds extra value to a service that I choose to subscribe to. With XM, I have the comfort of knowing that the programming I can easily receive at home can be taken with me if I need to travel to one of the metropolitan areas covered by the Traffic and Weather service channels.

XM radio doesn't have the up-to-the-minute severe weather coverage that I tune to whenever a storms brew and tornados blow through Oklahoma. I doubt that XM will ever be able to offer the same level of local service a local station can provide (e.g. severe weather outbreaks, school closings, etc) for Oklahoma City.

Another concern regards Sirius Radio and their coverage of regional NFL games. An excellent example would be my father. I grew up in Minnesota and my parents decided to retire in rural Arkansas. In the 5 years that they have lived there, every fall, there has been the frustrating effort to attempt to pick up some news of the Viking's football games. AM/FM radio reception of the game is impossible. No local stations cover the game. Dish network came out with their full coverage, but it was an additional cost to what my parents considered to be an expensive satellite service that they wouldn't use except for the game. Dial up internet where they live is quite slow (rural Arkansas) and picking up audio broadcasts over the internet was fret with occasional disconnects, broken streams, and much rebuffering (most Internet broadcasters have forgotten about the dial up users stuck out so far that they can manage at best a 28-33k dial up connection).

I was thrilled when I discovered that Sirius radio was going to begin offering all of the NFL games. For once, my father would be able to tune in to the Vikings (or any other game for that matter) each Sunday afternoon (at a price he was willing to pay). This is what technology is supposed to provide: the ability to do things we weren't able to do five or ten years ago ... for less. I'd hate to see the NAB throw a wrench in this new satellite radio technology as it is just beginning to take off.

If the NAB is really concerned that they are losing market share to satellite radio, then maybe they should be pushing toward their own digital services that offer greater choice. DTV is one example of where I can sit at home and pick up over a dozen signals without all of the static and ghosts. But the most innovative station I pick up is not ABC, NBC, or CBS. It is PAX. They fully utilize their four SDTV signals allowing me to watch the standard local broadcast, PAX's west coast signal (which really comes in handy if I missed my favorite show), and two other channels carrying educational, religious, and infomercial programming. The only other local DTV stations that carry multiple signals are the local NBC and ABC affiliates, and the best they've done is provide a second channel for weather/radar information. If digital radio can offer anything close what digital television offers, then the local sports radio station should be able to broadcast not one, but maybe half a dozen different sports games, at the same time.

If the local stations got their act together, they could set it up where a listener could subscribe to their service online, key in a subscriber code into their digital radio, and the subscriber gets to enjoy hearing the event while the local station rakes in revenue from listener/subscribers. If you were travelling in your car, an even better option would be for digital receivers to continue to operate after arriving at their destination - recording the remainder of the event to a hard drive - and allowing the listener to review the

game (just like TiVO). Radio stations could sell virtual tickets to concerts - and the fans would be able to take the music with them (for a ticket fee). Since most broadcasters are affiliates of some sort, live concerts could be broadcast nationwide over local affiliate subscription services.

Clearly, the issue at hand is not whether XM and Sirius radio are challenging local broadcasters with more local programming. The issue is whether or not local affiliates will step up to the challenge of offering more choice to the local consumer. If local broadcasters are losing listeners to satellite radio, it is because the local broadcasters are NOT meeting the needs and wants of the listeners.